COMMENTS ON DRAFT STAFF ANALYSIS

Peace Officer Procedural Bill of Rights
05-RL-4499-01 (CSM 4499)

BY THE CITY OF SACRAMENTO

I, Dee Contreras, state:

That I am the Director of Labor Relations for the City of Sacramento, which position I have held since November 1995. From 1990 until November 1995, I was the senior labor relations representative for the City of Sacramento. In these positions, my duties include negotiations with unions pursuant to the Meyers-Milias-Brown Act, contract administration, processing grievances, discipline review for police and fire, as well as miscellaneous employees[1]. Thus, I have been personally responsible for review of police discipline matters. In these positions, I have been involved in all areas of labor relations.

I have been involved in the labor relations area since 1980. I was a labor union representative from August of 1980 until June of 1990. I represented employees in disciplinary actions and hearings. I represented and defended the employees and unions in grievances. I negotiated and reviewed civil service rules and their application. I was thus involved in all aspects of labor relations from the union side for this period of time.

I am also an attorney, who has been licensed to practice in the State of California from November, 1979.

From my substantial experience in representing both labor and management, I am extremely familiar with both the *Skelly* process as well as the Peace Officers Procedural Bill of Rights (POBOR), and the differences between the two. I also was the primary individual for presenting and testifying on the within test claim when same was originally heard by the Commission on State Mandates. As a result, I have personal knowledge of the facts stated herein and if called upon to testify, I could do so competently.

The Commission on State Mandates, although it has done an admirable job, does not have a sound understanding of the differences between *Skelly* and POBOR, and as a result, has made some substantial errors in the Draft Staff Analysis upon the reconsideration of the Parameters and Guidelines, and has forgotten much of the testimony given at the hearings here, and documentation contained within the Statement of Decision (hereinafter "SOD").

[1] Miscellaneous employees are those that are not safety employees, i.e. those that are not sworn police and fire.

1. The Administrative Appeal Activities Are Too Narrowly Drawn

The Commission accepts, without any evidentiary reference or testimony, that the position of the State Controller is correct concerning the narrowing of activities necessary to conduct administrative hearings. There is no evidence in the record which supports the position of the State Controller.

First of all, it must be remembered that these administrative hearings are warranted because there are no *Skelly* rights to same. The limited activities demonstrate a total lack of what is entailed in preparing for an administrative hearing.

There may not be any investigation which occurs prior to the administrative hearing. For example, the department may need to transfer personnel due to management changes. At the hearing, I testified how, many years ago, the City of Sacramento needed to eliminate a unit due to budgetary concerns. When we notified the employees of the fact that the unit was being eliminated, the officers claimed it was a punitive transfer and demanded a hearing. This was although there was no punishment – it was simply the exercise of the management's prerogative. (A.R. 527-528.) Thus, prior to the request for administrative hearing, there will have been no investigation whatsoever. This is because punishment is frequently in the mind of the employee.

Absent POBR, we would not have to suffer a hearing brought by the employees. However, with POBR, we must go through the administrative hearing and prove that the transfer was not because of discipline. As stated in my previous testimony, the City of Sacramento has no such thing as a transfer for discipline. Thus, all the work necessitated by the request for administrative hearing is **solely** as a result of POBOR.

The same is true for the termination of a chief of police. Absent a written employment contract to the contrary, Chiefs of Police hold their position at the will of the appointing authority. At will employees can be terminated for any reason, or no reason at all. As I stated in my testimony before the Commission[2], when someone is terminated during probation, before they become a permanent employee entitled to civil service protections, they are just notified that they are terminated, without a reason. Same would be true for a police chief, but for the protections of POBOR. Now every police chief who is removed from his position is required to be given a written notice, the reason for removal, and the opportunity for an administrative appeal

The Commission Staff's Draft Staff Analysis does not provide for any reimbursement for an administrative appeal of the removal of a police chief, implying that any such removal would automatically be entitled to an administrative hearing under due process as a "liberty interest" hearing. This is not accurate.

For example, in *Williams* v. *Department of Water and Power* (1982) 130 Cal.App.3d 677, Ms. Williams was an intermittent, noncivil service employee who had worked in her position for 13 years. She was terminated due to excessive absenteeism. She sought

[2] See A.R., at pages 528-529.

reinstatement and, amongst other things, a "liberty interest" hearing. The court held that not only was she not entitled to reinstatement, the basis for her termination did not give her the right to a liberty interest hearing. The court found, essentially, that unless the basis involved moral turpitude, there is no right to a liberty interest hearing:

> "The mere fact of discharge from public employment does not deprive one of a liberty interest. (*Beller* v. *Middendorf* (9th Cir. 1980) 632 F2d 788, 806; *Gray* v. *Union County Intermediate Education District* (9th Cir. 1975) 520 F.2d 803, 806.) Appellant must show her dismissal was based on charges of misconduct which "stigmatize" her reputation or "seriously impair" her opportunity to earn a living. (See *Codd* v. *Velger*(1977) 429 U.S. 624, 628 [51 L.Ed.2d 92, 97, 97 S.Ct. 882].) Although *Lubey* v. *City and County of San Francisco* (1979) 98 Cal.App.ed 340 [159 Cal.Rptr. 440], articulates the exception to the rule on which appellant relies (p. 346), it is of no assistance to her. The misconduct in *Lubey* involved moral turpitude of police officers and further, the civil service commission advised they were entitled to no future city and county .employment (p. 344). Here the termination was for excessive absenteeism, not conduct involving moral turpitude, and the civil service commission advised appellant that she will not be disqualified automatically and can be considered for city employment. "Nearly any reason assigned for dismissal is likely to be to some extent a negative reflection on an individual's ability, temperament, or character. (*Jenkins* v. *U.S. Post Office,* 475 F.2d 1256, 1257 (9th Cir. 1973). But not every dismissal assumes a constitutional magnitude." (*Gray* v. *Union County Intermediate Education District* (9th Cir. 1975) 520 F.2d 803, 806.)
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> "The leading case of *Board of Regents* v. *Roth* (1972) 408 U.S. 564, 574 [33 L.Ed.2d 548, 559, 92 S.Ct. 2701] distinguishes between a stigma of moral turpitude, which infringes the liberty interest, and other charges such as incompetence or inability to get along with coworkers which does not. The Supreme Court recognized that where "a person's good name, reputation, honor or integrity is at stake" his right to liberty under the Fourteenth Amendment is implicated and deserves constitutional protection. (408 U.S. at p. 574 [33 L.Ed.2d at p. 559].) "In the context of *Roth*-type cases, a charge which infringes one's liberty can be characterized as an accusation or label given the individual by his employer which belittles his worth and

> dignity as an individual and, as a consequence is likely to have severe repercussions *outside* of professional life. Liberty is not infringed by a label of incompetence, the repercussions of which primarily affect professional life, and which may well force the individual down one or more notches in the professional hierarchy." (*Stretten* v. *Wadsworth Veterans Hospital* (9th Cir. 1976) 537 F.2d 361, 366; itaqlics added; fn. Omitted.)" *Williams, supra* at 684-685.

The Commission's Draft Staff Analysis does not distinguish between those situations where there would be a right to a due process liberty interest hearing from all situations where a Police Chief is terminated. As seen above, only those situations involving allegations of moral turpitude rank a liberty interest hearing.

It is not uncommon for a change in the composition of a city council to result in a change in department heads and management. The removal of a police chief due to a majority's desire to have different management would not, absent POBOR, give rise to a liberty interest hearing. However, under POBOR, the Chief of Police would be entitled to all the protections that POBOR affords, including an administrative hearing.

Although the removal of a Police Chief is not an every day occurrence, it would be a rare circumstance where the allegations would, absent POBOR, give rise to a liberty interest hearing. This factor has been totally overlooked by Commission Staff. Notwithstanding the law, the Commission staff is apparently of the opinion that every police chief that is dismissed has a "liberty interest" in the position. That is not correct.

Although liberty interests are entitled to a due process hearing, that is not what is called for under POBOR. Under POBOR, **all** chiefs of police are entitled to a written notice, the reason for removal, and the opportunity for an administrative appeal, regardless of whether the reason for removal involves a liberty interest.

Again, although the removal of a Police Chief is not an every day occurrence, it would be a rare circumstance where the allegations would, absent POBOR, give rise to a liberty interest hearing. This factor has been totally overlooked by Commission Staff. Thus, the activity of an administrative hearing for a police chief upon termination, which does not involve a "liberty interest" should be reimbursable – absent POBOR, no such hearing would be involved.

In order to conduct such a hearing, there is much preparation which must be undertaken. This is not reflected in the SCO's requested terminology, which the Commission Staff wishes to accept. There is no reimbursement for witness preparation, locating and finding witnesses, investigation of possible defenses to be raised by the employee, etc. In fact, there are no direct costs allowed for hearing preparation at all. Furthermore, there is no evidence that the SCO is cognizant of what is necessary to conduct such a hearing.

This omission is glaring. As no charges are involved with these administrative hearings, yet the SCO wishes to exclude the activity of reviewing charges, obviously they have misunderstood the type of hearing which is covered.

Furthermore, no costs of the administrative panel are included. The administrative panel as well as its clerical and legal staff should be included, because absent POBOR, there would be no such hearings. Commission Staff, on page 11 of the Draft Staff Analysis, again refers to the fact that these hearings are disciplinary: this shows how Staff has forgotten the days of testimony at the hearings on the test claim and parameters and guidelines. These hearings **are not disciplinary.** Since these hearings do not bear on disciplinary matters, the fact that employees were disciplined prior to POBOR is irrelevant. The original terminology should not be changed – to do so indicates that SCO and Commission Staff are not familiar with the documents which govern this matter.

The same is true of actions taken regarding at will and probationary employees. These employees have no *Skelly* rights as they have no property interest in their position. With probationary and at will employees, absent POBOR, all that was necessary is to tell them that their services are no longer needed. If you have a probationary employee, usually no discipline is given – their services are just terminated. This can be for a myriad of reasons, and absent POBOR, no reason is necessary. Now, all the safeguards that were extended to permanent employees, who have a property interest in their position, is afforded them through POBOR. Thus, all costs incurred in such hearings, including the preparation for same and investigation, should be compensable.

Additionally, there is a change in terminology proposed by Staff that could be misleading. On page 12 of the Draft Staff Analysis, it appears as though, and properly, sheriff security officers and police security officers are not covered by POBOR. However, the manner in which this has been drafted, it appears as though sheriff and police security officers are specifically excluded. Given our experience in dealing with SCO auditors, it should be made clear that it is sheriff security officers are excluded – the manner in which it presently is proposed to read could be interpreted by auditors to exclude sheriff deputies as well.

3. Interrogations Are Too Narrowly Interpreted

At the hearing on the test claim, substantial evidence was presented as to how a POBOR interrogation differs from that of a civil service employee who is not entitled to those protections[3].

First of all, when you are interrogating a civil service employee, you do not have to notify them in advance of the allegations of misconduct. You can merely ask them where they were at a given time on a given day. You don't have to inform the person that the allegation was that they were out of the jurisdiction at a liquor store at a particular time.

[3] See, for example, A.R. 525 *ff.*, 550 *ff.*

With POBOR, the officer receives notice of the allegations in advance. As the officer is entitled to representation, this means that the officer will have had time to prepare a response and reason for his or her conduct in advance. This makes interrogations, and the preparation for them, much more difficult. All possible theories and explanations must be investigated in advance, so that the officer will not be able to come up with an easy rationale for his conduct.

It is for that reason that the time spent preparing for the hearing, as well as providing the notice and name of the interrogating personnel in advance, was allowable as a reimbursable activity. Additionally, it was my understanding that not only straight time was to be allowed for the interrogation, but if overtime was necessitated, that would also be compensable as well.

In no other circumstance does due process require that the allegations of misconduct be presented to the employee in advance. This renders interrogations much more onerous than would be required absent POBOR. Commission Staff has not found any authority for the proposition that due process requires an employee to be provided with notice of the interrogation, as well as the identification of the interrogating personnel in advance. Also, the Commission Staff has totally disregarded the testimony in the record regarding the more onerous requirements imposed when interrogations are handled under POBOR.

This information was provided to the Commission at the various hearings herein and in written format. (*See* A. R. 837-742, 991-994). Absent POBOR, the employee subject to discipline has no concept of what the basis is for discipline. Absent POBOR, in the normal due process case, you do not have to inform the employee about the nature and subject of the questioning, and you do not have to prepare questions focused upon a particular area, seeking to get the information you can from the employee. In non-POBOR matters, you can explore other areas in the questioning as they arise, which allows for a much more free-form questioning process.

In contrast, however, with employees covered by POBOR, you must tell the employee prior to the initial questioning what the purpose of the meeting is, what it is you will be discussing with him or her, and you have to be prepared to be clearly on point as to where you are going and your expectations about the questioning process. You cannot engage in broader questioning for information, because the employee has the right to know the subject about which he or she is being interrogated.

POBOR rights result in a different type of preparation for questioning. POBOR requires that you prepare not just for the possibility of a hearing and the possibility of preparing allegations or a *Skelly* notice, but you have to focus the questions on what will be the boundaries as to the scope of the questioning of the employee. In all disciplinary matters, when you receive a complaint or allegation of wrongdoing, you have to first find out what all the charges might be, and then speak to the other possible witnesses first. However, with POBOR, you must be much more circumspect in preparation.

For example, an actual case situation occurred wherein there was an allegation that an officer failed to handle a particular call properly, that there was the possibility that excessive force was used and the individual was in the hospital. Given the seriousness of the allegations, we commenced speaking with the witnesses immediately. Everyone involved except the complainant, from the officer who was alleged to have used excessive force, as well as his sergeant, was a peace officer covered by POBOR. When the sergeant, who was thought to be a witness, came in for questioning, he was informed that the subject of the questioning was one of his subordinate officers. However, in the course of discussions with the sergeant, it became apparent that he failed to file a required form when a person is hospitalized or injured. In Sacramento City, when someone is injured, the sergeant is required to file a form which is an alert to indicate that an arrestee has been hospitalized. In this situation, as you walk through the incident, we became apprized that the sergeant failed to file the required form.

At that point, do you ask the sergeant if he filed the form?? Do you stop the process and inform the sergeant that his status has changed from witness to someone being investigated for improper conduct? This is important, because the city initially had not realized that the sergeant had not completed the requisite form, and were asking him about the incident. Thereafter, the city interrogated the officer. When the case was assembled for review by chain of command, it was clear the sergeant in question had not completed the requisite form. The supervisor had been interrogated as a witness and not as a potential target for discipline in this matter. Where do you stand with this situation? Do you go back and re-interview the sergeant at this point, after he has given you the entire story which renders him culpable? POBOR complicates the situation.

In the normal due process case, the employee would have uttered statements which indicate that he did not file the appropriate form, you could ask him whether or not he had filed the form, and the issue would be over. However, with POBOR, you have to give the sergeant, who was previously called as a witness, a copy of a transcript of his prior testimony as he entitled to it since he was a witness on the matter previously in the other officer's case. Since you never know when a witness may end up being the subject of discipline, not only do you have to more carefully prepare each case, but you also have to tape record each peace officer's testimony should the eventuality occur that the witness becomes the target of an investigation. This is just one example of why there has to be more and thorough preparation.

As any peace officer who is a witness in the course of one individual's investigation could become the subject of their own investigation, it is imperative to do more preparation prior to the initial questioning. We now perform a more complete review to ascertain that witnesses who may become subjects are identified prior to interrogation. For obvious reasons, the person who is accused of excessive force may not have documented the use of such force which was the initial reason for creating the incident report. In other words, the playing field is littered with barriers created by POBOR which must be addressed and they are very different from, and in addition to, the requirements of due process.

Obviously, if you are going to re-interview a peace officer, you have to be prepared to give them a copy of their prior transcript. You also have to go back and review it, to make sure where you are heading in the second interview. You must focus on whether the testimony corroborates or conflicts with what transpired previously in order to ask intelligent questions. In a non-POBOR matter, you can follow up by asking additional questions without regard to the reason you have the employee in for questioning in the first place. However, with POBOR, the whole questioning is focused on what you have identified as an allegation. Thus the definition of what the allegations are must come early in the process. If someone calls to complain about something, the subsequent investigation may bring to light little about the complaint of the citizen, but may demonstrate an internal operating problem or conflict you have to address. The additional rights granted by POBOR make that more difficult as indicated above.

Additionally, there is the complication of the fact that the person being interrogated has the right to a representative at the hearing. This means that questioning takes longer. The representative often requests breaks, not because of the fact that the questioning has gone on for a long period of time, but to confer with the person being interrogated and prepare possible responses. Additionally, sometimes the representative is there not only to assist the witness, but also to cause difficulties with the interrogation process in order to make things more difficult for the officers asking the questions and, hopefully, derail them from the path of the questioning. This adds time, and is further an indicia of why meticulous preparation is necessitated by POBOR, which is not required for regular due process questioning.

A further matter is that police departments, and sheriff's departments, run a 24 hour a day, 7 day a week, 365 day a year operation. Thus, it is quite probable that the person being interviewed will not be on the same shift as those interrogating the witness. Whenever possible, we will pay overtime to the questioning officers, and not the officer being questioned. If you have someone with the possibility of discipline being the person being interrogated, the last thing you want to do, as management, is to "reward" the possibly offending officer with the payment of overtime. That encourages drawing out the interrogation process, and rewards officers for misconduct. If an officer who is the subject of an interrogation is being paid overtime, it behooves that officer and his or her representative to make the process last as long as possible in order to have the extra pay. I testified to this at the hearing herein.

Since Government Code, section 3303(a) requires that the interrogation take place during the duty hours of the officer or the normal waking hours, the interrogations are conducted during normal business hours. Thus, whereas straight time should be allowed for the person being interrogated, the overtime pay necessary for the interrogating officers should be allowed. To only pay overtime for the officer being interrogated is not cost effective, will result in increased claims, and reward officers being disciplined with overtime pay.

Thus, the fact that the Commission Staff does not want to pay overtime to the interrogator will result in substantially increased costs, which does not assist management, and will result in much greater costs to the State.

Furthermore, the Draft Staff Analysis contains the statement: "Claimants are not eligible for reimbursement under interrogation when a peace officer being investigated under POBOR is not subjected to an interview or interrogation, but is subject to possible sanctions." This makes no sense. Also, it opens up an avenue for the State Controller to disallow costs of interrogation during audit.

Accordingly, it is respectfully requested that the following activities be found reimbursable:

- Compensating the peace officers for interrogations, including off-duty time in accordance with regular department procedures. (Gov. Code, §3303(a).)
- Providing prior notice to the peace officer regarding the nature of the interrogation and identification of the investigating officers. (Gov. Code § 3303(b) and (c).
- That not only overtime but straight time for interrogations, as well as the time for their preparation, be found reimbursable.

4. Reasonable Reimbursement Methodology

Government Code, Section 17518.5 allows for the development of a reasonable reimbursement methodology.

The Commission Staff has unilaterally recommended that the CSAC proposal be rejected because it is based on "unedited" claims. There is no provision in statute for "unedited claims". We believe that the Staff meant "claims which have not been audited". However, there is no requirement that all claims be audited before a reasonable reimbursement methodology can be adopted.

The Department of Finance recommended that a reasonable reimbursement methodology be adopted for each individual claimant after their claims were audited. The Commission Staff recognized that the Department of Finance's proposal was not realistic in light of the fact there are 478 cities and 58 counties within the State of California.

The CSAC proposal was denied on the basis that the Bureau of State Audits believed that there were questions about 45% of the total amounts claimed by the various cities and counties. However, rather than examining the request of $528 per officer and proposing an alternative that allowed 55% of the total costs or $290.40 per officer, the Commission denied the request in its entirety.

With regard to the proposal by the County of Los Angeles, which was supported by substantial empirical data, the Commission Staff adopts the criticisms of the State Controller, which did not provide any data to support its criticism. Apparently, the Commission believes that the State Controller's audits are the final word on reimbursable

activities, and notwithstanding the fact that I believe there will be a substantial number of Incorrect Reduction Claims filed, adopts the criticism of the State Controller.

Rather than being of assistance in adopting a reasonable reimbursement methodology, the Commission Staff has dismissed any attempts to set forth same. However, Commission Staff has not set forth any rationale or methodology that would meet its criteria. In fact, the Commission has failed to set forth what its criteria is and what would be sufficient to meet it.

The transaction costs to both State and local government in tracking and documenting the costs of POBOR are substantial. The costs to the SCO for its audits is substantial. Rather than just dismissing all attempts to obtain a reasonable reimbursement methodology, the onus should be on Commission Staff to set forth a reasonable criteria which it would accept in order to establish a reasonable reimbursement methodology. On that basis, the City of Sacramento is hopeful that Commission Staff will have a prehearing to discuss this matter, or in the alternative, that the Commission itself will direct its Staff to establish criteria for a reasonable reimbursement methodology so as to avoid the substantial transaction costs incurred in completing the POBOR claims as they presently are constituted.

Conclusion

Although Commission Staff has done an admirable job of analysis when it comes to the fact that POBOR does, in fact, constitute a reimbursable mandate, the lack of operational knowledge concerning labor relations is apparent.

Additionally, the manner in which the Commission Staff adopts all of the recommendation of the State Controller to limit reimbursable activities without any indicia of evidence, and rejects any suggestions by those who actually perform the activities denies the knowledge base which has been accumulated over the past decades. This is a difficult program, insofar as it is an addition to a constitutionally required provision. It is not as simple as finding all, or almost all, components of a program reimbursable.

It should be the goal of the Commission to assist in determining a reasonable reimbursement methodology, to avoid all the transaction costs presently being incurred. Reasonable has been defined as: "1. Having the faculty of reason; rational; as a *reasonable* being. 2. Governed by reason; being under the influence of reason; thinking, speaking, or acting rationally, or according to the dictates of reason; agreeable to reason; just; rational; as *reasonable* men; a *reasonable* cause. Men have no right to what is not *reasonable.* 3. Not excessive or immoderate; within due limits; proper; as a *reasonable* demand, amount, price."[4]

Thus, although there is statutory criteria requisite to establish a reasonable reimbursable methodology, there has been just mere dismissal of all attempts to establish same,

[4] *Webstser's New International Dictionary* (1928), p. 1779.

without direction. The City of Sacramento requests that the Commission and its Staff provide direction and the time requisite to establish a reasonable reimbursement methodology.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief, and as to those matters stated upon information and belief, I believe them to be true. Executed this 22nd day of September, 2006 at Sacramento, California.

Dee Contreras

Dee Contreras

PROOF OF SERVICE BY MAIL

I, the undersigned, declare as follows:

I am a resident of the County of Sacramento, and I am over the age of 18 years and not a party to the within action. My place of employment is 915 I Street, Administration Building, Room 4133, Sacramento, CA 95814.

On September 22, 2006, I served the Comments on Draft Staff Analysis, *Peace Officer Procedural Bill of Rights,* City of Sacramento, by placing a true copy thereof in an envelope addressed to each of the persons listed on the mailing list attached hereto, and by sealing and depositing said envelope in the United States mail at Sacramento, California, with postage thereon fully prepaid.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed this 22 day of September, 2006, at Sacramento, California.

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